

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROADGET BUSINESS PTE. LTD.,

Plaintiff,

vs.

THE INDIVIDUALS, CORPORATIONS, LIMITED
LIABILITY COMPANIES, PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE A TO THE
COMPLAINT,

Defendants.

Case No.: 1:24-cv-01174

Judge Sunil R. Harjani

Declaration of Taylor J. Wilson

1. I am an attorney licensed to practice in Illinois and before this Court. I am counsel for Plaintiff Roadget Business Pte. Ltd. in this matter.

2. I submit this Declaration in support of Plaintiff's Motion for Entry of Default and Default Judgment. I have personal knowledge of the facts stated herein. If called as a witness, I could and would testify to these statements.

3. I hereby certify that the Defaulting Defendants (as defined in the accompanying Motion and Memorandum) were properly served with a summons, the First Amended Complaint, and the TRO on September 27, 2024. ECF Nos. 41–42. I hereby certify that the Defaulting Defendants have failed to plead or otherwise defend this action within the allotted time in violation of Federal Rule of Civil Procedure 12(a)(1)(A).

4. Based on contact information produced by third-party websites hosting the Defaulting Defendants' stores, the Defaulting Defendants are located outside of the United States. Accordingly, I believe that the Defaulting Defendants are not active-duty members of the

U.S. armed forces. Based on the fact that the Defaulting Defendants operate online marketplaces, I believe that they are not infants or incompetent persons.

5. On January 29, 2024, and February 5, 2024, a member of my team clicked each of the links to the Defendants' marketplaces which appear in the "Defendant Online Marketplace" column of Schedule A to the Complaint. They confirmed that, as of that date, each such Defendant seller offered shipping to the United States, including Illinois, and accepted payment in U.S. dollars from U.S. bank accounts.

6. Attached as Exhibit 1 to this Declaration are true and correct copies of the copyright registration certificates showing Roadget's ownership of the copyrights infringed by the Defaulting Defendants.

7. Attached as Exhibit 2 to this Declaration are true and correct screenshots of the Defaulting Defendants' infringing product listings, which were taken by a member of my team on January 29, 2024; February 5, 2024; and February 9, 2024. The screenshots show the infringing product listing and show the shipping page for the product, demonstrating that the Defaulting Defendants offered to ship the infringing products to an address in Chicago, Illinois.

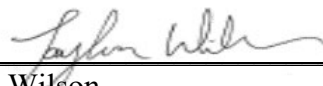
8. Attached as Exhibit 3 to this Declaration, for the Court's convenience, is a spreadsheet that was previously filed at Dkt. 45-1. This spreadsheet contains revenue data for the Defaulting Defendants, which was produced by Amanda Woodall, counsel for Temu, on September 26, 2024. The relevant rows of the spreadsheet have been highlighted for convenience, and show that the Defaulting Defendants had revenue from infringing sales in the following amounts:

Defendant	Revenue
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Defendant No. 2	\$4,539.30
Defendant No. 3	\$4,498.83
Defendant No. 4	\$76,724.25
Defendant No. 8	\$548.59
Defendant No. 12	\$18,140.75
Defendant No. 14	\$5,531.02
Defendant No. 15	\$6,187.35

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 7, 2024

By: 
Taylor J. Wilson